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 8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 VALENCIA MANAGEMENT LLC SERIES)	CASE NO.: 2:22-cv-00345-APG-DJA
10 4, a Nevada limited liability company,)	
11)	
Plaintiff,)	STIPULATION AND ORDER TO
12 vs.)	EXTEND TIME TO RESPOND TO
13)	NEWREZ LLC, F/K/A NEW PENN
NEWREZ LLC, F/K/A NEW PENN)	FINANCIAL, LLC, D/B/A
14 FINANCIAL, LLC, D/B/A SHELLPOINT)	SHELLPOINT MORTGAGE
MORTGAGE SERVICING; NATIONAL)	SERVICING'S MOTION FOR
15 DEFAULT SERVICING CORPORATION,)	PROTECTIVE ORDER
DOE individuals I through XX; and ROE)	
16 CORPORATIONS I through XX,)	(Second Request)
Defendants.)	
17)	

18 Plaintiff VALENCIA MANAGEMENT LLC SERIES 4 ("Plaintiff") and Defendant NEWREZ
 19 LLC, F/K/A NEW PENN FINANCIAL, LLC, D/B/A SHELLPOINT MORTGAGE SERVICING
 20 ("Defendant"), by and through their attorneys of record, after meeting and conferring on September 2,
 21 2022, hereby submit this Stipulation for an extension of time for Plaintiff to respond to Defendant's
 22 Motion for Motion for Protective Order [Doc #29], which was filed on August 23, 2022, from the
 23 current date of September 6, 2022 to September 20, 2022.

25 This is the second stipulation for extension of time to oppose Defendant's Motion for
 26 Protective Order.

27 This request was made after September 6, 2022, the current deadline to oppose the Motion for
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Protective Order given Plaintiff's counsel's excusable neglect. While the verbal stipulation was made between the parties prior to September 6, 2022, Plaintiff's counsel's child's ongoing medical needs caused the delay in the filing of the instant stipulation.

The stipulated request for an extension of time for Plaintiff's counsel to oppose Defendant's Motion for Protective Order is necessitated by Plaintiff's counsel's child's ongoing medical needs. Plaintiff's counsel is a solo practitioner. Plaintiff's counsel has an 8 year old child with a history of kidney cancer, and chronic kidney disease who has recently required additional medical attention and necessitated Plaintiff's counsel to be unavailable for her regular office hours during which she would have otherwise drafted the opposition to the Motion for Protective Order.

This extension is sought in good faith, and is not intended to cause any delay or prejudice to any party.

DATED this 12th day of September 2022

CLARK NEWBERRY LAW FIRM

/s/ Aimee Clark Newberry
 AIMEE CLARK NEWBERRY, ESQ.
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DATED this 12th day of September 2022

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*Case 2:22-cv-00345-APG-DJA
Stipulation and Order to Extend Time*

ORDER

IT IS HEREBY ORDERED that Plaintiff shall file its Opposition to Defendants' Motion for Protective Order on or before September 20, 2022.


UNITED STATES MAGISTRATE JUDGE
DATED: 9/13/2022

Respectfully submitted by:

CLARK NEWBERRY LAW FIRM

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